

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DODORA UNIFIED COMMUNICATIONS,
INC.,

Plaintiff,

v.

DIRECT INFORMATION PVT. LTD.,
LOGICBOXES, WEBHOSTING. INFO.,
TRANSECUTE (I) PVT. LTD.,
RESELLERSRS, INC., AND
ANSWERABLE, INC., COLLECTIVELY
d/b/a "DIRECTI.COM"

Defendants.

Civil Action No.
05-10016-NMG

AFFIDAVIT OF BHAVIN TURAKHIA IN SUPPORT OF MOTION TO DISMISS

1. I am employed by the defendant Direct Information Pvt., Ltd. ("Directi") as its CEO. I also am the founder of the defendants Transecute(I) Pvt. Ltd. and ResellerSRS, Inc. and own stock in Transecute and Directi. Directi owns the stock of ResellerSRS. I make the statements in this affidavit of my own knowledge, except as to those statements made based on my belief or understanding. With respect to the latter, I believe them to be true.
2. The other defendants named in the complaint, LogicBoxes and WebHosting.info, are not separately-incorporated companies. Rather, they are simply trade names or unincorporated divisions of Directi. The defendant Answerable, Inc. is an unrelated company that is not owned by Directi or any of its shareholders. A Malaysian client of Directi owns Answerable, Inc., and it had nothing to do with the facts that are alleged in the complaint.

3. Transecute also had nothing to do with the events outlined in the complaint. Transecute provides payment gateway services to companies located in India. It also is an ICANN-accredited domain registrar, but it does not actively market domain registration services. Transecute's operations are located in Mumbai, India and, to the best of my knowledge, it has no connection to Massachusetts, has done no business here and has not communicated with Dodora or anyone else here.
4. ResellerSRS is a relatively new business that focuses on selling to resellers of domain names registration services. ResellerSRS was not involved in the activities that Directi conducted under authority of and under contract to the Texas receiver. ResellerSRS maintains a bank account in the U.S., to which Pool.com (a company located in Canada) transmitted monies, the bulk of which were transmitted to the Texas receiver. (I described these transactions in my previous affidavit.) However, that account is not located in Massachusetts. ResellerSRS also does no business in Massachusetts, and it has not communicated with Dodora or anyone here, to the best of my knowledge.

Sworn to under the pains and penalties of perjury, this 11th day of February 2005.

/s/Bhavin Turakhia

Bhavin Turakhia